

# TEXAS BORDER SHERIFF'S COALITION



March 27, 2012

The Honorable Julius Genachowski, Chairman  
The Honorable Robert McDowell  
The Honorable Mignon Clyburn  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Big Bend Telephone, Inc. Petition for Waiver, *Connect America Fund*, Report  
and Order and Further Notice of Proposed Rulemaking, WC Docket No. 10-90

Dear Mr. Chairman and Commissioners:

We write regarding our concern that the FCC's recent Universal Service Order could threaten our Nation's security by disrupting the critical communications services that the members of the Texas Border Sheriff's Coalition rely on to protect the U.S.-Mexico border. The Texas Border Sheriff's Coalition was organized on May 4, 2005, and is represented by the Chief Law Enforcement Officer of each respective county. Membership is limited to counties within 25 miles of the Texas/Mexico border. There are now 20 member counties which are Brewster, Cameron, Culberson, Dimmit, El Paso, Hidalgo, Hudspeth, Jeff Davis, Jim Hogg, Kinney, Maverick, Pecos, Presidio, Starr, Terrell, Val Verde, Webb, Willacy, Zapata, and Zavala. The Texas partnership is bolstered by Sheriffs, City Police Departments, Texas Department of Public Safety with their Texas Rangers, Highway Patrol, Aviation Assets, Investigators, the Texas Parks and Wildlife Division (Game Wardens), and our Federal partners led by Customs and Border Protection. This force multiplying group has a common goal of keeping our state and nation safe. Texas Sheriffs, empowered by the state constitution, are committed, from a national security perspective, to protect lives, property, and the rights of the people, maintain order and security in the United States along the Republic of Mexico border, enforce the law impartially, and provide police service in partnership with other law enforcement agencies and community partners. This is the Mission of the Coalition.


Big Bend Telephone Company ("Big Bend") is the pre-dominate communications provider that offers critical communications services to six member counties along the Texas border. We understand that Big Bend's service territory covers 25 percent of the Nation's border with Mexico and half of the Texas-Mexico border. One of our mission critical responsibilities is to keep this border secure. Without high quality voice and broadband services, we would not be able to do our job. Big Bend's network allows numerous Texas Border Sheriff's Offices to access reliable voice and broadband services and dedicated special access circuits which are necessary for the success of critical operations.

We understand that to provide these services, Big Bend relies on universal service support as required by Section 254 of the Communications Act. We further understand that the

FCC's recent Order jeopardizes Big Bend's ability to continue to offer services to our business locations. According to its petition for waiver, we understand that, under the FCC's new rules, Big Bend would default on its' loan covenants as early as next year. Accordingly, unless the Commission waives its rules as applied to Big Bend, we are concerned that the primary communications network capable of serving a number of our members needs and the needs of other federal and state institutions tasked with protecting a majority of the Texas border will be shut off and, as a result, border security would be fundamentally undermined by this disruption in communications.

Thank you for your attention to this important issue.

Sincerely,



Donald L. Reay  
Executive Director  
Texas Border Sheriff's Coalition